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5 "K" LINE AMERICA, INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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11 "K" LINE AMERICA, INC., a) Case No.: C-06-02268 MJJ
corporation,)
12 Plaintiff,) **STIPULATION AND [PROPOSED] ORDER**
13 vs.) **REGARDING DISCOVERY DISPUTE**
14 MARSH RISK AND INSURANCE)
SERVICES; MARSH USA, INC.; MMC,)
INC., SEDGWICK JAMES; AND DOES)
ONE THROUGH TEN,)
Defendants.)

STIPULATION AND PROPOSED ORDER REGARDING
DISCOVERY DISPUTE

Whereas, MARSH USA INC. ("MARSH") has not yet made its written Initial Disclosures which were initially due June 20, 2006, nor has it timely responded to written discovery requests of "K" LINE AMERICA, INC. ("KAM"), which were due on February 21, 2007; and,

Whereas KAM has timely and properly met and conferred with MARSH over these issues; and,

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1 Whereas MARSH and KAM wish to resolve this dispute without
2 the need for formal motion or other contested petition to the
3 Court, and instead wish to enter into a stipulation and order
4 reflecting relief that would in the ordinary course be likely to
5 be granted after a discovery motion;

6 MARSH and KAM hereby agree and stipulate as follows:

- 7 1) MARSH shall serve its initial disclosures and its
8 response to KAM's outstanding written discovery
9 requests, without objection save as to privilege,
10 no later than March 9, 2007;
11 2) As to KAM only, KAM's fact discovery, expert
12 disclosure, expert report and expert discovery
13 cutoffs are each hereby extended 35 days.
14 3) All other dates are maintained. MJJ

15 DATED: March 5, 2007

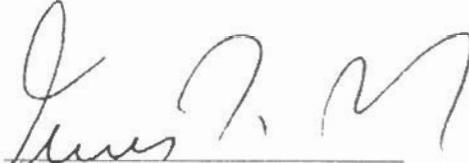
FLYNN, DELICH & WISE LLP

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18 By 
Conte C. Cicala

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20 Attorneys for Plaintiff
21 "K" LINE AMERICA, INC.

22 DATED: March 5, 2007

LUCE, FORWARD, HAMILTON & SCRIPPS

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25 By 
Denis F. Shanagher
26 Attorneys for Defendant
27 MARSH USA, INC.
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[PROPOSED] ORDER

Pursuant to stipulation, and good cause having been shown,

IT IS SO ORDERED.

Dated: 3/7/07

Maria J. Laskins

UNITED STATES DISTRICT JUDGE

FLYNN, DELICH & WISE LLP

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STIPULATION AND ORDER RE: DISCOVERY
CASE NO. C-06-02268 MJJ